

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDREW CORPORATION	:	
	:	
Plaintiff,	:	Case No. 08-C-3088
	:	
-against-	:	Hon. Harry D. Leinenweber
	:	
DANIEL CASSINELLI,	:	
	:	
Defendant.	:	

**MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S MOTION
FOR EXPEDITED DISCOVERY**

In response to Plaintiff's Motion for Expedited Discovery, Defendant Daniel Cassinelli respectfully submits the following:

The motion for expedited discovery should be denied. The hearing on this motion for preliminary injunction is not scheduled to be heard until August 21, 2008, which leaves ample time for the parties to cooperatively make arrangements for discovery without the need for court-ordered expedited discovery. Indeed, Cassinelli has responded to Plaintiff's interrogatories in an expedited fashion, although his time to do so has not yet expired. Defendant's counsel believes counsel can continue to work together cooperatively.

If, however, the motion for expedited discovery is granted, discovery should be expedited equally for both parties, and Defendant should be entitled to obtain discovery from Plaintiff on the same expedited terms that Plaintiff receives.

Wherefore, Defendant Daniel Cassinelli respectfully requests that the motion for expedited discovery be denied.

Dated: July 9, 2008

CHENG COHEN LLC

By: /s/ Andrew P. Bleiman

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